

cc: Ct, USA, USM
Prob. Off, Cnd.

ORIGINAL ³ 125-1

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

DION CARRIER

1: CR - 01 - 173
) Criminal No.
)
) (Judge)
)
)

MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, moves pursuant to Rule 6 of the Federal Rules of Criminal Procedure to file this Motion and the following documents under seal:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Indictment | <input type="checkbox"/> Complaint |
| <input type="checkbox"/> Complaint, Arrest Warrant, and Affidavit | <input type="checkbox"/> Search Warrant, Application and Affidavit |
| <input type="checkbox"/> Plea agreement | |

FILED
HARRISBURG, PA
MAY 16 2001
MARY E. D'ANDREA, CLERK
Per Deputy Clerk

1. The United States requests that the above-referenced documents, and this Motion, remain under seal pending:

- ☒ The arrest of the Defendant(s);
- ☐ Further Order of Court; or
- ☐ Written notification by the United States that these pleadings no longer need to remain filed under seal; or
- ☐ Until a return is made of the search warrant by the executing agents.

2. In support of this Motion, the United States alleges that filing these pleadings under seal is necessary in order to:

- ☐ Preserve the integrity of this ongoing case;

- ☐ Ensure the safety of investigative personnel;
- ☐ Protect the identity of potential witnesses;
- ☐ Allow for the seizure of evidence;
- ☒ Permit the arrest of those charged with violations of federal criminal laws; or

WHEREFORE, for the foregoing reasons, the United States moves to seal this Motion and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

MARTIN C. CARLSON
United States Attorney


WILLIAM A. BEHE
Assistant U.S. Attorney